

AO 91 (Rev. 11/11) Criminal Complaint

AUSA: Michael C. Martin
Special Agent: Alan SouthardTelephone: (313) 226-9100
Telephone: (313) [REDACTED]

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America
v.
Kamran MajeedCase: 2:18-mj-30178
Judge: Unassigned,
Filed: 03-28-2018
CMP: USA v MAJEED (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 6, 2017 and September 22, 2017 in the county of Wayne in theEastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 1001

False Statements

18 U.S.C. 1425(a)

Attempted Naturalization Fraud

This criminal complaint is based on these facts:

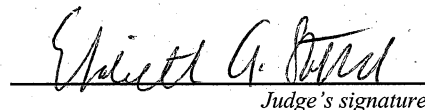
See Attached Affidavit

☒ Continued on the attached sheet.
Complainant's signature

FBI Special Agent Alan Southard

Printed name and title

Sworn to before me and signed in my presence.

Date: MAR 28 2018City and state: DETROIT, MICHIGAN
Judge's signature

ELIZABETH A. STAFFORD

UNITED STATES MAGISTRATE JUDGE

I, Alan K. Southard, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed since August of 2006. Previously, I was an Illinois State Trooper from February, 2002 to August, 2006. My duties, responsibilities, and training as a Special Agent with the FBI include investigating violations of federal criminal law. I have participated in the investigation and prosecution of individuals who made false statements to the government.

2. The information in this affidavit is based on my personal knowledge and on information provided to me by other law enforcement officers and witnesses and is provided for the limited purpose of demonstrating probable cause to support the issuance of a criminal complaint. This affidavit, therefore, does not summarize all of the facts known to me or other law enforcement agents and officers at this time.

3. KAMRAN MAJEED, is a Pakistani-national from the Punjab Province of Pakistan. He is the son of Abdul Majeed and the brother of Hammad Majeed. On or about July 25, 2012, KAMRAN MAJEED, entered the United States.

4. In or about December 2001, the Department of State designated Lashkar-e-Tayyiba ("LET") as a Foreign Terrorist Organization under Section 219

of the Immigration and Nationality Act and Executive Order 13224. LET has claimed responsibility for numerous terrorist acts against Pakistani, Indian, and United States interests, and is responsible for the November 2008 Mumbai attacks. According to publically available information, LET is one of the largest and most active terrorist organizations in South Asia, and has as its stated objective to create an Islamic state in South Asia. Since the Department of State designation of LET as a foreign terrorist organization, LET has repeatedly changed its name and created front organizations in an effort to avoid sanctions.

5. For example, shortly after LET was designated as a foreign terrorist organization, LET changed its name to Jamaat-ud-Dawa (“JUD”), through which LET seeks to raise money for terrorist activities. Falah-I-Insaniat Foundation (“FIF”) is a Pakistan-based organization that was created by LET and its humanitarian front organization JUD. The Department of State has determined that FIF is JUD with a new name, designed to evade scrutiny and sanctions.

6. In or about November of 2010, the Department of State amended the designation of LET as a Foreign Terrorist Organization to include the FIF as an alias of LET. At the same time, Hafiz Abdur Rauf, a senior LET leader and current head of the FIF, was made a Specially Designated Global Terrorist under Executive Order 13224.

7. The terrorist organization LET and its front organization FIF are based in the Punjab Province of Pakistan.

8. On or about April 25, 2016, KAMRAN MAJEED signed an Application for Naturalization, Form N-400, which was received by the United States Citizenship and Immigration Services in the Eastern District of Michigan on or about April 29, 2016. Part 12, Question 10 of Form N-400 asks, in part: "Have you EVER been a member of, or in any way associated (either directly or indirectly) with . . . A terrorist organization?" KAMRAN MAJEED answered "No" to this question. In Part 13 of Form N-400, above KAMRAN MAJEED's signature, is the following statement: "I certify, under penalty of perjury, that I provided or authorized all of the information in my application, I understand all of the information contained in, and submitted with, my application, and that all of this information is complete, true, and correct."

9. On or about November 6, 2016, KAMRAN MAJEED, was interviewed at his residence by Special Agents from the Federal Bureau of Investigation. At the beginning of the interview, KAMRAN MAJEED was advised that it was unlawful to lie to an FBI agent.

10. During the interview of KAMRAN MAJEED on November 6, 2016, KAMRAN MAJEED stated to the FBI Special Agents that he, KAMRAN MAJEED, does not know anyone who is a member of, supports, sympathizes with, or funds any terrorist organizations in Pakistan, including LET.

11. At this time, Hammad Majeed was a Facebook follower of Hafiz Abdur Rauf, who is a leader of FIF and who has been designated by the Department of State as a Specially Designated Terrorist. Hammad Majeed also followed the Facebook pages "F.I.F. Pakistan" and "Qadsia Islamic Centre." Both of these Facebook pages contain images of FIF activities, personnel, and links to other JUD websites.

12. Soon after the interview of KAMRAN MAJEED, Hammad Majeed changed his Facebook profile name to "Hammad Rajput" and KAMRAN MAJEED removed and disassociated his brother, Hammad Majeed, from one of KAMRAN MAJEED's Facebook accounts.

13. On or about November 21, 2015, an article titled, "Analysis: Militancy's charitable face" was published in the online periodical Dawn. The article recounts the activities of FIF near Chitral, Pakistan, following a natural disaster in the area. Chitral, Pakistan, is located in the mountainous region of northern Pakistan. The article begins with the following text:

The murmur of Quranic recitation can be heard from behind the opaque glass doors at the Fala-e-Insaniyat Foundation (FIF) markaz in

Chitral city on a chilly November evening... On the walls in the office of the centre's administrator, Abdul Majeed, is a chart listing various activities FIF had undertaken...

14. On or about December 1, 2015, Hammad Majeed posted an image of snow-covered mountains on his Facebook timeline. The image was captioned: "At Iwari top Chatral." The Lowari Pass is a high mountain pass near Chitral, Pakistan. The Lowari Pass is sometimes referred to as the Lowari Top. In the English language, the Lowari Top is also commonly spelled "Iowari Top."

15. From on or about July 20 through August 31, 2017, Hammad Majeed stated to another person that he is a worker for FIF, his father is a leader, and his elder brother sends money to FIF via Western Union. Specifically, Hammad Majeed claimed about KAMRAN MAJEED:

We r 5 brothers and 1 sister... Hafsa... Fahad, Farhan, Kamran, Umar and me Hammad... 2 are meried nd 1 will be in oct... Kamran. He sends money then we donate it... There are three groups: 1# the people who donate and collect the money and send... 2# the people who work for FIF and take part in activities... 3# the people who handle all this as leader.

16. Hammad Majeed explained his role in FIF is in the first group as a fundraiser, while their father: "He is in Group #3 as well." Later, Hammad Majeed said, "I asked my dad where we can use it [the money]... He told me we can use it in madaris, mosques, making well for water, in the houses of shaheeds in rescue purposes in qurbani program."

17. According to financial records obtained from Western Union, KAMRAN MAJEED has wired over \$50,000 to his father's address in Pakistan. More than \$21,700 was received by KAMRAN MAJEED's father, Abdul Majeed.

18. During the interview on November 6, 2016, KAMRAN MAJEED stated to FBI Special Agents that his cellular telephone number is (248) XXX-3649. KAMRAN MAJEED said he is the only person to have access to this cellular telephone. KAMRAN MAJEED stated to FBI Special Agents that he never used this telephone to communicate with anyone in Pakistan. According to call detail records for cellular telephone number (248) XXX-3649 that were obtained from a cellular telephone company, there were 1,535 international calls made or received by cellular telephone number (248) XXX-3649 during the period July 25, 2012 to August 28, 2016. Most of these international calls were to or from Pakistan. From January 1, 2016, to August 28, 2016, there were 43 calls to or from Pakistan. Many of these telephone calls to and from Pakistan lasted for several minutes, and some of these calls are as long as 20 minutes in duration.

19. During the interview on November 6, 2016, KAMRAN MAJEED stated to FBI Special Agents that the only Facebook account he has is "Kamran.Majeed," which he registered in 2012. I subsequently identified two Facebook accounts attributable to KAMRAN MAJEED, neither of which were "Kamran.Majeed." Instead, KAMRAN MAJEED's Facebook accounts are: user

ID 100008447867799 (user name “Kami Kamran”) and 100000747224441 (user name “Kamran Kami”). These accounts were discovered by using various combinations of the search terms: Kamran, Majeed, Office Depot, Michigan, and Gujranwala. KAMRAN MAJEED used photos of himself as the profile picture for both of these Facebook accounts. Both accounts listed Office Depot as a place of employment. KAMRAN MAJEED briefly worked at the Office Depot near Highland, Michigan when he first came to the United States. The account with user ID 100000747224441 (user name “Kamran Kami”) listed Highland, Michigan as his home. The profile picture of the user ID 100000747224441 account is an image of KAMRAN MAJEED on a boat posted on July 23, 2014. In the comments section of the image, KAMRAN MAJEED responded to a question from his brother, “Detroit river [sic] connected with Canada.” Hammad Majeed, who KAMRAN MAJEED has told me is his brother, had liked the posted image.

20. On or about September 22, 2017, KAMRAN MAJEED was interviewed a second time by Special Agents from the Federal Bureau of Investigation. At the beginning of the interview, KAMRAN MAJEED was advised that it was unlawful to lie to an FBI agent.

21. During the interview on September 22, 2017, KAMRAN MAJEED stated to the FBI Special Agents that he, KAMRAN MAJEED, knew LET and JUD were terrorist organizations before he came to the United States. KAMRAN

MAJEED further stated to the FBI Special Agents that he, KAMRAN MAJEED, does not know anyone who is a member of, supports, sympathizes with, or funds any terrorist organizations in Pakistan, including LET and FIF.

22. Hammad Majeed's Facebook account was deleted about an hour after KAMRAN MAJEED was interviewed by FBI Special Agents on September 22, 2107.

23. Based on the facts set forth above, there is probable cause to believe that KAMRAN MAJEED knowingly and willfully made material false statements to an agent of the Federal Bureau of Investigation, in violation of Title 18, United States Code, Section 1001(a)(2). There is also probable cause to believe that KAMRAN MAJEED knowingly attempted to procure his naturalization as a United States citizen contrary to law, that is, by signing and submitting an application for naturalization that contained false statements, in violation of 18 U.S.C. § 1425(a).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Alan K. Southard', written over a horizontal line.

Alan K. Southard
Special Agent, Federal Bureau of Investigation

Subscribed and sworn to before me

on MAR 28 2018:

Elizabeth A. Foster

UNITED STATES MAGISTRATE JUDGE